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Subject: Comments on Draft Recommendation for Cleanup Report for  
Compass/former GST Steel property

I have reviewed the draft "Recommendation for Cleanup Report Compass Big Blue Site Investigation (Old GST Steel Mill) Kansas City, MO," dated July 3, 2003. As we discussed in our meeting on July 11, I have a few comments on this draft document that I would like for Compass to address before the document is resubmitted to EPA and forwarded to MDNR for their review as well. These comments are as follows:

1. General Comment: Please add page numbers.
2. Section 3, Project Description: The last sentence of this paragraph needs to read as follows: "The samples were analyzed for lead and cadmium based on qualitative results of the RFI conducted by AK Steel (Burns & McDonnell 1999)."
3. Section 7, Recommendation for Cleanup: The fourth sentence of this paragraph needs to read "CBB recommends the cleanup of lead impacted soils in SWMU 8 and 11 where soils pose a *potential* risk to future on site workers."
4. Section 9, Evaluation of Cleanup Alternatives: This section needs to clarify that both Alternative 2, Engineered Barrier, and Alternative 3, Excavation and Off-Site Disposal, are for SWMUs 8 and 11, and that both alternatives need to include Institutional Controls for SWMUs 25 and 26. A brief discussion of institutional controls needs to be added to this section. A viable option is to use the institutional controls discussed in Missouri's CALM document. Recognizing that CALM is meant for VCP sites, it still may be the best option for putting institutional controls in place which may be monitored by MDNR. Rich Nussbaum, MDNR Corrective Action Unit, and I talked about using the Missouri State Registry, which was the option present by EPA Counsel, Howard Bunch. However, upon further examination, there are some issues and restrictions with the state registry which may not be favorable to properties where transfer of ownership is imminent.
5. Table 4, 5, and 6: As discussed in comment #4 above, Institutional Controls needs to be added to cleanup Alternatives 2 and 3.
6. Section 10, Summary: As discussed above, the first sentence of this section needs to clarify that in the proposed cleanup alternative, excavation and off-site disposal is for SWMUs 8 and 11, and institutional controls are proposed for SWMUs 25 and 26.
7. Appendix B, first figure: This figure implies that the extent of contamination has not been defined to the north and south of the known source area. Please revise this figure and any pertinent text to include information that indicates the rationale for why no further sampling was done in the northern and southern directions (e.g., the presence of concrete or asphalt covering, if that is the case).

Please let me know if you have any questions regarding these comments. Following revision and resubmittal of the draft report, I will forward a copy to MDNR for their review and approval. The next step is for me to prepare a letter stating that EPA and MDNR are in agreement with your proposed cleanup for these SWMUs, and giving you direction as to how to proceed with the cleanup if you choose to do so. Following implementation of the proposed cleanup, Compass needs to submit a report, telling EPA and MDNR that it has completed its cleanup. Provided that Compass has submitted appropriate documentation to confirm that the cleanup is completed and contamination has been mitigated, EPA can prepare the Statement of Basis for the cleanup and, with MDNR, make the administrative record for the property available for public review and comment. I realize that this step wise explanation is a bit simplified, but those are the general steps.



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